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7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 THE MICHEL FAMILY TRUST,

11 Plaintiff,

12 vs.

13 TRAVELERS INDEMNITY COMPANY
14 OF CONNECTICUT, THE TRAVELERS
15 INDEMNITY COMPANY, and DOES 1 to
100, inclusive,

16 Defendants.
17

CASE NO. C09-04144 PVT

18 **STIPULATION TO SUBMIT JOINT
STATEMENT OF UNDISPUTED FACTS
WITH MOTION FOR SUMMARY
JUDGMENT AND REQUEST TO
ALLOW THE MOTION TO EXCEED 25
PAGES;**

19 |XXXXXXXXXX| ORDER THEREON

20 TO THE HONORABLE PATRICIA V. TRUMBULL, U.S. DISTRICT COURT MAGISTRATE
JUDGE:

21 **STIPULATION**

22 WHEREAS, Plaintiff MICHEL FAMILY TRUST and Defendant TRAVELERS
23 INDEMNITY COMPANY OF CONNECTICUT (“Travelers”) have met and conferred and have
24 agreed that certain facts in this litigation are undisputed and certain documents have been
25 authenticated and are admissible as evidence, for purposes of Travelers’ Motion for Summary
Judgment only;

26
27 NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff
28 MICHEL FAMILY TRUST and Defendant TRAVELERS INDEMNITY COMPANY OF

1 CONNECTICUT hereby stipulate that, pursuant to Local Rule 56-2, the parties be allowed to file
2 a Joint Statement of Undisputed Facts, with Exhibits, for use in supporting and opposing
3 Travelers' Motion for Summary Judgment.

4 **REQUEST BY TRAVELERS TO EXCEED 25-PAGE LIMIT**

5 Because the undisputed facts in this matter are lengthy, Travelers respectfully requests that
6 the Court permit it to file a motion for summary judgment that exceeds the 25-page limit set by
7 Local Rule 7-2 by no more than seven pages, such that the motion shall be no longer than 32
8 pages.

9
10 Respectfully submitted,

11 DATED: August 11, 2010

12
13 **FORAN GLENNON PALANDECH PONZI &**
RUDLOFF PC

14 By: /s/ Kathleen M. DeLaney
15 Kathleen M. DeLaney

16 Attorneys for Defendant
TRAVELERS INDEMNITY COMPANY OF
CONNECTICUT

17 DATED: August 11, 2010

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19 **WILLIAMS, PINELLI & CULLEN, LLP**

20 By: /s/ Amy Carlson
21 Amy Carlson

22 Attorneys for Plaintiff
MICHEL FAMILY TRUST

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ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, that on or before August 17, 2010, the parties may file a Joint Statement of Undisputed Facts, with Exhibits, for use in supporting and opposing Travelers' Motion for Summary Judgment.

IT IS FURTHER ORDERED that Travelers' Motion for Summary Judgment may be up to 32 pages in length.

Date: August 12, 2010

Patricia V. Trumbull
PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE